

EXHIBIT "1"

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

DIN YUAN STEVEN SUN,
an individual,

Plaintiff,

v.

Defendant "1" a/k/a CHEN (JAY) HAN, an
individual; and JOHN DOES 1 – 20, as yet
unidentified Individuals, Business Entities, and/or
Unincorporated Associations,

Defendants.

CASE NO.

DECLARATION OF PLAINTIFF DIN YUAN STEVEN SUN

I, Din Yuan Steven Sun, declare and state as follows:

1. I am over 18 years of age. I have personal knowledge of the matters set forth in this Declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. I am the Plaintiff in the above-styled action.

3. I have reviewed my Complaint [DE 1] in this action and state that all factual allegations are true.

4. Defendant "1" stole my cryptocurrency, as set forth in my Complaint.

5. Based on the context and content of the conversations between myself, my agent, and Defendant "1", I have a reasonable belief that Defendant "1" a/k/a CHEN (JAY) HAN, is located in the People's Republic of China ("China").

6. I am of Chinese ancestry, and I am intimately familiar with Chinese heritage and culture.

7. From my and my agent's conversations with Defendant "1", I gleaned the details consistent with Defendant's China location. For example:

- a. Defendant's Chinese Accent and Frequent Mention of China: When Defendant "1" spoke English he had a distinct Chinese accent. He frequently mentioned China throughout conversations.
- b. Proficiency in Speaking Chinese: Defendant "1" demonstrated a high level of proficiency in speaking the Chinese language when he frequently incorporated the Chinese language during conversations.
- c. Name of Chinese Origin: Defendant's stated name is of Chinese origin.
- d. Emails Written in Chinese: Defendant "1" consistently sent emails that were written entirely in the Chinese language.
- e. Unusual Communication Hours: Defendant "1" engaged in communications during hours that do not coincide with regular business hours in the United States. The communication time patterns are consistent with a China time zone.

8. Accordingly, I have reasonable cause to believe Defendant "1" is located in China.

9. Defendant's crypto wallets are the only contact information I have.

10. Defendant "1" no longer answers any of the other communications he used during his fraud (telephone, text, WhatsApp, and e-mail).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

05 / 16 / 2023

Executed on May __, 2023.

By: 
Din Yuan Steven Sun



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